

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

CONTIQUE WILLCOT,

Plaintiff,

VS.

SECURITIES & EXCHANGE
COMMISSION, GTS SECURITIES LLC,
ARI RUBINSTEIN, NEXT BRIDGE
HYDROCARBONS, INC., JOHN BRDA,
GREGORY MCCABE, FINANCIAL
INDUSTRY REGULATORY AUTHORITY,

Defendants.

Case No. 7:24-CV-317-DC-RCG

**DEFENDANT MCCABE’S UNOPPOSED MOTION
TO EXTEND PLEADING DEADLINE**

Defendant Gregory McCabe files this unopposed motion seeking an extension of his deadline to answer or otherwise respond to Plaintiff's Amended Complaint (Doc. 3) and respectfully shows the Court as follows:

1. Mr. McCabe's deadline to respond to Plaintiff's amended complaint is May 8, 2025 (Doc. 18).
2. After appearing in this case, Mr. McCabe retained the undersigned counsel, who also represents Defendant John Brda. Mr. Brda's responsive pleading deadline is June 16, 2025. (Doc. 19).
3. Good cause for this extension is made because it would align the responsive pleading deadlines for two defendants and streamline the issues to be presented to the Court.
4. Accordingly, Mr. McCabe respectfully requests that the Court extend his deadline to answer or otherwise respond to Plaintiff's Amended Complaint to June 16, 2025.

5. This is Mr. McCabe's second request for an extension of time.
6. This extension is not sought for purposes of delay, but so that justice may be done.
7. Undersigned counsel conferred with *pro se* Plaintiff; Plaintiff indicated he is unopposed to the requested extension.

[signature page follows]

Dated: April 28, 2025.

Respectfully submitted,

/s/ Jason S. Lewis

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ATTORNEYS FOR DEFENDANT

GREGORY MCCABE

CERTIFICATE OF CONFERENCE

Pursuant to the Local Civil Rule CV-7(G), the undersigned hereby certifies that, as counsel for Defendant McCabe, he conferred with Plaintiff Contique Willcot via telephone and email on April 24, 2025. Plaintiff has indicated that he is not opposed to the relief requested by this motion.

/s/ Ryan D. Lantry
Ryan D. Lantry

CERTIFICATE OF SERVICE

I certify that I served the foregoing document on all counsel of record via the Court's CM/ECF system on April 28, 2025.

/s/ Jason S. Lewis
Jason S. Lewis